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June 26, 2020

MEMO ENDORSED

VIA ECF

The Honorable Sidney Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Candie Hailey Means v. City of New York, et al.,
Case No. : 17 CV 5374 (SHS) (KNF)

Your Honor:

We represent Plaintiff, Candie Hailey Means in the above-referenced action. I write to respectfully request the Court's permission to file certain documents under seal as exhibits to Plaintiff's Opposition to Defendants' motion for summary judgment.

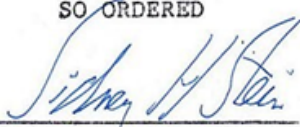
Plaintiff is seeking permission to file Plaintiff's medical records under seal. These records are protected from public disclosure to preserve Plaintiff's privacy rights pursuant to the Health Insurance Portability and Accountability Act ("HIPAA"), 43 U.S.C. 1320, et seq. See also Dubose v. Boudreaux, 2014 U.S. Dist. LEXIS 123777, at *2 n. 3 (S.D.N.Y. August 20, 2014).

In addition, Plaintiff is also seeking to file an additional document under seal pursuant to the parties Stipulated Protective Order So Ordered by the Court. It is a disciplinary record related to an individually-named Defendant.

Thank you for your consideration.

Application granted.

**Dated: New York, New York
June 29, 2020**

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.

Respectfully Submitted,

THE COCHRAN FIRM



Tracey L. Brown

cc: Steve Stavridis, Esq. (via _ _ _ ,

